

THE CONFEDERATED SALISH AND KOOTENAI TRIBES  
OF THE FLATHEAD NATION

P.O. Box 278  
Pablo, Montana 59855  
(406) 675-2700  
FAX (406) 675-2808  
RECEIVED BY U.S. FISH  
AND WILDLIFE SERVICE  
GRIZZLY BEAR RECOVERY  
COORDINATORS OFFICE.

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October 23, 1997

Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator  
U. S. Fish and Wildlife Service  
P. O. Box 5127  
Missoula, Montana 59806

Dear Dr. Servheen:

The Confederated Salish and Kootenai Tribes of the Flathead Nation have reviewed the Draft Environmental Impact Statement for Grizzly Bear Recovery in the Bitterroot Ecosystem. Our comments on the document follow.

As you are aware, much of the Bitterroot Ecosystem is located within the aboriginal territory of the Salish and Kootenai people. We co-existed there with the grizzly bear just as we do today on the Flathead Indian Reservation. While compromises in human activities are often necessary to do so, our experience has shown that these compromises do not provide insurmountable obstacles. Our management of grizzly bears and the important features of their habitat have not precluded timber harvest, forest access, recreation, subsistence activities or agricultural pursuits. It is quite clear that these activities can occur in conjunction with proper management, a reasonable degree of knowledge and an understanding of the characteristics and requirements of the bear.

**Alternative One (The Proposed Action) - Reintroduction of a Nonessential Experimental Population**

1 While we found many aspects of this alternative interesting, we have several concerns with the proposal. We believe that the designation of the Citizens' Management Committee is a very worthy endeavor, but we have previously seen such committees of diverse interests bogged down by disagreement to a point where they become ineffective. We also are concerned about the potential lack of effectiveness of such a group if it does not have the ability, both real and legal, to institute its recommendations.

The designation of this population as a non-essential population also raises concerns. While we fully agree with the need for management flexibility associated with this program, we feel that management flexibility currently exists for bears listed as Threatened under the Endangered Species Act in other areas, such as the Northern Continental Divide Ecosystem.

An additional concern relates to the sites from which bears would be obtained for relocation. It also seems ironic that, under Alternative 1, bears that are now afforded the protection of the Endangered Species Act would lose much of that protection simply because they were unlucky enough to be captured as a part of the Bitterroot Reintroduction Program.

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Ultimately, we believe that the success of this effort will be based upon sound management. We believe that the foundation of that management involves affording this species adequate protection under the Endangered Species Act. A component of that protection is a need for consideration of potential impacts of various human activities. The usual mechanism for such consideration of impacts is the Section 7 consultation process. Yet, it apparently will not be applicable if this population is designated as a non-essential experimental population under this alternative.

Taken together, the designation of the population as non-essential and the lack of the Section 7 consultation process could possibly doom the success of the reintroduction effort. It will certainly prolong the chances for success.

#### **Alternative 2 - No Action Alternative: Natural Recovery**

We cannot support this alternative. One has only to look at the success of natural recovery of grizzly bears to date in the Bitterroot Ecosystem to realize that the chances of natural recovery are virtually impossible.

#### **Alternative 3 - The No Grizzly Bear Alternative**

We do not support consideration of this alternative because we firmly believe that grizzly bears can and should exist in the Bitterroot Ecosystem. This alternative, which prevents any grizzly bear recovery efforts, is unacceptable.

Dr. Christopher Servheen  
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**Alternative 4 - Reintroduction of a Threatened population with full protection of the Endangered Species Act**

In evaluating Alternative 4, we found that many of the concerns related to Alternative 1, as discussed above, were dealt with effectively in this alternative. We support the protection provided by the Act and the consultation process prescribed in Section 7 of the Endangered Species Act.

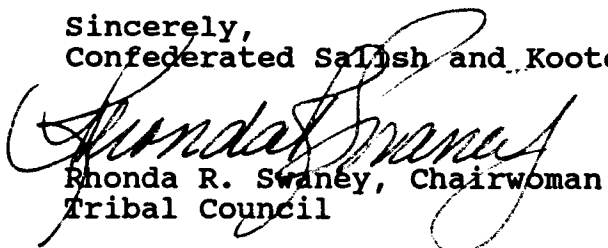
3 We are also concerned with the need to stress the importance of protection of existing roadless areas as potential bear habitat. In addition, it is necessary to plan for existence and maintenance of linkage zones between grizzly populations to ensure continued population viability. This alternative seems to take into consideration the real habitat needs of grizzly bears and proposes viable approaches to dealing with those needs.

4 Given the high profile of this effort and the questions that have been raised about the adequacy of the scientific arguments for the program, we believe that the establishment of a Scientific Committee to define needs for research, reintroduction strategies and monitoring cannot harm the program. In fact, it should serve to strengthen it.

While Alternative 4 makes no mention of a Citizen's Management Committee, it may be worthwhile to consider an amendment to the Alternative to establish such a committee. Again, however, our concerns about the role, the potential effectiveness and the ability of the Committee to accomplish its duties are relevant points for consideration.

In conclusion, we believe that the principles embodied in Alternative 4 of the Draft Environmental Impact Statement provide the best approach to achieve recovery of grizzly bears in the Bitterroot Ecosystem while providing a foundation of sound habitat management and reasonable protection and management flexibility. We urge the U. S. Fish and Wildlife Service to adopt Alternative 4 as the Proposed Action in the Final Environmental Impact Statement.

Sincerely,  
Confederated Salish and Kootenai Tribes

  
Rhonda R. Swaney, Chairwoman  
Tribal Council